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MARX

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May 23, 2018

VIA EMAIL

kimberly_darling@njd.uscourts.gov

Honorable Leda Dunn Wettre
United States Magistrate Judge
Martin Luther King, Jr. Federal Bldg. & U.S.
Courthouse 50 Walnut Street, Room 4C
Newark, New Jersey 07102

**Re: United States v. Parmjit Parmar a/k/a Paul Parmar,
Criminal No. 18-8040**

Dear Judge Wettre:

This letter is submitted on behalf of Parmjit Parmar a/k/a Paul Parmar and sets forth his proposed bail package, together with a detailed outline of his personal circumstances, the nature of the charges, the statutory factors, and the reasons why the proposed conditions are just and appropriate and satisfy the statutory standard.

On May 16, 2018, Mr. Parmar was arrested in New Jersey and charged in a complaint with Securities fraud.

At his presentment later that day, the government requested an order of detention. After hearing argument from the parties, this court granted the government's request but invited counsel to assemble a bail package for the court's consideration.

In requesting an order of detention, the government proffered that Mr. Parmar was a flight risk because he allegedly has access to a lot of money, he has travelled frequently overseas, and he is facing a long sentence based upon a strong case. None of these arguments can overcome Mr. Parmar's Constitutional interest in pretrial liberty, nor can they satisfy the standard required by the Bail Reform Act, *i.e.* that there is no combination of conditions that can reasonably assure Mr. Parmar's appearance in court when required and the safety of the community.

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MR. PARMAR IS NOT A FLIGHT RISK

Mr. Parmar, referred to herein as “Paul,” is 48 years old, he is a United States Citizen and he has no criminal history.¹ He was born in India and came to the United States in 1993, when he was 22 years old. He became a citizen about six years later and, in doing so, he gave up his Indian citizenship.

In arguing for detention, the government focused on his Indian heritage and the fact that he travelled to India twice in the last year. Although, like many Americans, Mr. Parmar was born elsewhere, virtually all of his extended family lives here, having either preceded, accompanied or followed him to the United States. Paul took one of his two trips this year to India in order to attend a ceremony when his last grandparent died. He has no close family members left in India.

Mr. Parmar’s family in the United States is large by any measure (for a citizen or naturalized citizen):

- His father is here and lives with Paul;
- His brother and sister and his sister’s two children live here. The family of Paul’s sister-in-law are all naturalized United States citizens (born in India);
- He has 4 or 5 cousins on his father’s side, all of whom reside in the United States.
- He has four cousins on his mother’s side (his mother is deceased) who live here, and a few younger ones will come to the US after they graduate.
- Paul has been seeing his girlfriend now for about two years, and is deeply attached to her. He dated a previous girlfriend for about seven years, and they remain close friends.

From childhood, Paul idolized his father, who was a high-ranking officer in and aeronautical engineer for the Indian Navy, following in the footsteps of Paul’s grandfather, who was a Colonel. When Paul came to the United States in 1993, his father’s health was in decline. Paul insisted that his father retire and come to the United States with him. Paul’s father has lived with him since 1993, and he is now 76 years old. His father has a myriad of health issues, including hypertension and high cholesterol, which have required the placement of ten stents.

¹ We refer to our client as “Paul,” not to engender familiarity, but because a narrative of his life would sound stilted if we constantly referred to him as “Mr. Parmar.”



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For 25 years, Paul has made sure that his father's needs have been met. They have been each other's closest friend and companion. His relationship with his father has given him a lifelong admiration for soldiers and law enforcement officers who put themselves in harm's way in order to protect people.

Growing up with a father who was an aeronautical engineer, Paul developed an interest in airplanes and he learned how to fly (a fact the government cited as favoring detention). It was not an interest he pursued as an adult and he does not have a pilot's license.

During his early education, though high school and University in India, Paul was a star student, majoring in computer sciences. Not surprisingly, in the United States, he went to work for a series of major companies, including one of the top five financial institutions, a major consumer products company, and one of the top five defense contractors, where he was required to obtain security clearance. He worked for two other major corporations, tasked with centralizing and integrating their numerous subsidiaries, and also a top five pharmaceutical company, designing a structure for their sales force and compensation scales. For each he was engaged as an advisor or consultant for periods of time ranging from two to seven years. For the last year or so, he has worked for and owned a company that he that provides consulting services in the health care industry.

In the criminal and forfeiture complaints that have been filed, the government details the seizure of many millions of dollars, which Paul obviously does not have access to them. The related forfeiture complaint, 18-cv-09293, describes at length and traces the proceeds generated from the "scheme" alleged in the criminal complaint. It identifies the bank accounts that were allegedly used "to facilitate the fraud." Nowhere does the forfeiture complaint allege that funds were transferred overseas or that any particular funds could not be traced. Millions of dollars from the alleged "equity raises" and the "go private" transactions have been seized, including approximately \$20 million from a law firm/escrow agent's account, another \$56 million restrained and seized through Bankruptcy Court in Delaware, and real properties purchased for \$5,450,000 and \$15,074,100 (condominiums in NYC), \$1,745,000 and \$1,150,000 (land subsequently developed in New Jersey and increased in value). Other funds, over \$25 million, were paid out to third-party shareholders who are not alleged to have been involved in the "scheme," and who were owed funds for their shares as part of the go-private transaction. Although the government has argued that Paul has "access to a lot of funds," it has not identified, in the complaints or otherwise, any funds that were transferred overseas or to an unidentified recipient person or account.

Paul is not a risk of flight. He has extensive familial ties to the United States, and he does not have close family anywhere else. Moreover, he was aware of the likelihood of these charges well before his arrest. Yet, in order to arrest him, the agents requested that he meet with



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them near his home, and he complied. For many months before his arrest, he was aware that the Department of Justice was investigating him for the conduct alleged in the complaint. He was aware that the government seized funds related to the charges in March, 2017, and, almost a year ago, he received a grand jury subpoena related to the charges in the complaint. In addition, in mid-2017, his attorney met with prosecutors in Washington, D.C., who outlined the allegations. The U.S. Attorney's Office in Newark was no doubt aware of this, and could have called for Paul's surrender at any time. With this knowledge, Paul travelled outside of the country, and each time returned.

Paul is presumed to be innocent of the alleged charges. This is not a "presumption" case; it involves neither drugs or violence. The government does not claim that he is a danger to the community, nor would there be any basis for doing so. The issue under the Bail Reform Act is whether there is a combination of pretrial release conditions that will reasonably assure his appearance in court when required. The facts and circumstances are such that bail is warranted under the Bail Reform Act. The following proposed conditions will assure Paul's appearance:

PROPOSED CONDITIONS OF RELEASE

- (1) An appearance bond secured by six properties and a \$500,000 brokerage account, with a total equity of \$3.764 Million, and signed by five financially responsible sureties;
- (2) Global electronic monitoring which will record Mr. Parmar's location at all times;

In setting conditions of release, the court is bound to impose the least restrictive conditions that will reasonably assure the person's appearance and the safety of the community, considering the factors set forth in 18 U.S.C. § 3142(g), and summarized below:

The Nature and Circumstances of the Offense and whether there is a presumption in favor of detention (violent and drug crimes)	Mr. Parmar is a first-offender and the alleged crimes are not ones involving violence. The only presumption applicable in this case is the presumption of innocence.
The Weight of the Evidence	Without discovery, Brady and Giglio material and without an adequate opportunity to discuss the dense complaint at this early stage with an incarcerated client, the weight of the evidence simply cannot be addressed at this time. Mr. Parmar is presumed innocence.



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Nature and Seriousness of Any Danger to any Person or the Community	None. Mr. Parmar is not charged with a crime of violence and he has no criminal record.
The History and Characteristics of Mr. Parmar	
Character, Mental and Physical Condition, Employment	There are no issues regarding is mental or physical condition. He was previously employed by many major corporations as a consultant; he owns and works for a health care consulting company
Drug/Alcohol Abuse	None
Family Ties	Extended family living in close proximity, set forth above.
Financial Resources	For the last year, he has been earning a salary of approximately \$250,000. The government has seized somewhere around \$100 million; another \$25 million at least was previously paid out to shareholders; the government has not identified any funds that have been transferred overseas or otherwise secreted.
Length of Residence in the Community and Community Ties	He has resided in the New York/New Jersey area for 25 years. Letters from 30 friends and family are attached, demonstrating his extensive community ties.
Criminal History and Whether Offense Committed While Under Any Criminal Justice Supervision	None
Record Concerning Appearance in Court	He was never been called to and he has never failed to appear. He was arrested near his home with knowledge of the pending investigation of these charges.

Conditions of Release Will Assure Mr. Parmar's Appearance

Under 18 U.S.C. § 3142(c), a court “shall order” pretrial release, unless it finds, after a hearing, that “no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of any other person and the community.” The proposed



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reject all conditions short of ones that would “guarantee” the defendant’s appearance and the community’s safety. *See United States v. Orta*, 760 F.2d 887, 891 (8th Cir. 1985); *United States v. Szott*, 768 F.2d 159 (7th Cir. 1985).

Each bail decision “is *sui generis*, and must be decided on the basis of the particular record adduced.” *United States v. Traitz*, 807 F.2d 322, 325 (3d Cir. 1986). Under the Eighth Amendment, there is a substantive liberty interest in freedom from confinement.” *United States v. Perry*, 788 F.2d 100, 112 (3d Cir. 1986). The Bail Reform Act “establishes a right to liberty that is not simply discretionary but mandatory . . .” *United States v. Abuhamra*, 389 F.3d 309, 319 (2d Cir. 2004). This is because the right to be free from detention is one of the most elemental liberty interests. Even in the context of bail pending sentencing, and “even though a guilty verdict greatly reduces a defendant’s expectation in continued liberty, it does not extinguish that interest.” *Id.* at 309. As the Second Circuit has stated, “the court should bear in mind that it is only a ‘limited group of offenders’ who should be denied bail pending trial.” *United States v. Shakur*, 817 F.2d 189 (2d Cir. 1987) (quoting S. Rep. No. 225, 98th Cong., 2nd Sess. 7, reprinted at 1984 U.S.C.C.A.N. 3182, 3189).

Under 18 U.S.C. §3142(c)(B), the court must consider all reasonable, less-restrictive alternatives to detention. *See, e.g. United States v. Infelise*, 934 F.2d 103, 105 (7th Cir.) (remanding because trial court failed to consider electronic monitoring as a reasonable alternative to detention). Pretrial detention is an “exceptional step” that should only be taken in “rare cases.” *See United States v. Torres*, 929 F.2d 291, 292 (7th Cir. 1991); *United States v. Townsend*, 897 F.2d 989, 994 (9th Cir. 1990). The court’s role is to “reasonably assure” the defendant’s return to court, not “guarantee” it. *United States v. Orta*, 760 F.2d at 891-92. Whenever a court can fashion the conditions of an applicant’s release in such a manner that the risk may be alleviated, “it must do so and grant the motion for release.” *United States v. Carolina*, No. CR 17 MJ 3021 (JAD), 2017 WL 2426866, at *1 (D.N.J. June 5, 2017), *quoting United States v. Provenzano*, 605 F.2d 85, 93-94 (3d Cir. 1979). Pretrial release may be denied only as a matter of last resort. *Id.*

While the government typically relies on 18 USC 3142(g)(2), the weight of the evidence factor, this factor should be the least important consideration. *United States v. Gebro*, 948 F.2d 1118 (9th Cir. 1991). This is so because of the presumption of innocence and because of the lack of discovery at the bail/detention phase of the process. Moreover, the Bail Reform Act specifically states that “[n]othing in this section [3142] shall be construed as modifying or limiting the presumption of innocence.” 18 U.S.C. §3142(j).

For every 25-year sentence given to a WorldCom executive, a Bernard Ebbers, there is a 42-month sentence given to a CEO who participated in the cover up of a \$50-100 million fraud and who was deemed a “leader” of the scheme, *United States v. Adelson*, F. Supp.2d 506, 513-514 (S.D.N.Y. 2006), and a two-year sentence given to a top corporate executive, convicted of



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securities fraud and making false statements to the SEC. and held responsible for a \$544 Million loss. *United States v. Ferguson*, 584 F. Supp.2d 247 (D. Conn. 2008). *See United States v. Collins*, 07 CR1170 (RPP) (outside counsel to Refco, involved in a \$1.1 billion fraud, received a seven year sentence); *United States v. Parris*, 573 F. Supp. 2d 744 (E.D.N.Y. 2008) (defendant convicted at trial securities fraud conspiracy and witness tampering, with a guideline range of 360 months to life; sentenced to 60 months); *United States v. Witkowski*, No. 17-1628, 2017 WL 6048827, at *1 (3d Cir. Dec. 7, 2017) (New Jersey lawyer sentenced to 48 months for conspiracy that caused lenders \$40.8 million in losses through a mortgage loan fraud scheme and laundering the proceeds); *United States v. Kohler*, Case No. 1:07-cr-20446, Docket Entry 84 (S.D. Fla. Oct. 10, 2007) (Amended Judgment) (defendant pled guilty to securities fraud; responsible for \$471 million loss (ordered in restitution); guideline range was 324-405; sentenced to 5 years);

Finally, it will be very difficult for Mr. Parmar to participate meaningfully in his defense and assist defense counsel with his representation from inside a prison cell. It is likely that most of the discovery will be in electronic form in this complex case and an inmate's access to a computer is severely limited. All his calls will be monitored, further limiting his ability to communicate with counsel and prepare his defense.

As demonstrated above, this is not a case where it can be said that there are *no* combinations of conditions that can reasonably assure the accused's appearance when required and the safety of the community. Mr. Parmar should be released on the conditions proposed above.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeffrey C. Hoffman".

Jeffrey C. Hoffman
Windels Marx Lane & Mittendorf, LLP
156 West 56th Street, New York, NY 10019
Tel: 212.237.1018 | Fax: 212.262.1215
jhoffman@windelsmarx.com |

cc: Assistant U.S. Attorney Paul Murphy
paul.murphy@usdoj.gov

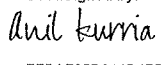
Elizabeth Auson, Pretrial Services Officer
Elizabeth_Auson@njpt.uscourts.gov

To Whom It May Concern

My Name is Anil Kurria resident of 1 Appaloosa Drive Manalapan, New Jersey 07726. I have known Paul Parmar personally for the last 15 years and we have worked together. To the best of my knowledge and belief, as a friend and colleague, he is a very good person and I have never heard anything negative about him. He is always very helpful to others and kind hearted person.

If you have any questions, please feel free to reach out to me.

Sincerely,

DocuSigned by:

EFBAF85D914D475...

5/17/2018

Anil Kurria
732-788-4302
1 Appaloosa Drive
Manalapan, NJ 07726

To whom it may concern

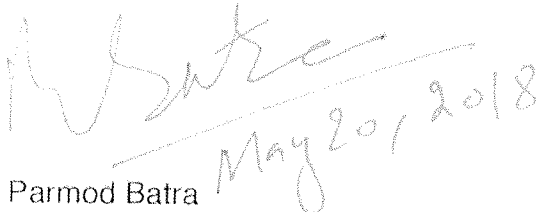
Dear Sir,

My name is Parmod Batra. I am a citizen of USA and have been in the USA since 1995. My family and I live at 114 Manchester Drive, Barrington, IL, 60010.

I have known Paul Parmar and his family since 1990. He was a junior in the same school from where we graduated. He has been a very trusted and good friend since we met in school. He has been living in New Jersey for 25 plus years. He is very well respected in his community and among all his friends.

All of Paul's immediate family (Father, sister and her family, brother and his family) lives in NJ area. He has a strong bond with his family. His dad lives with him and he takes care of him. I have visited Paul on various occasions and seen how much he cares about his dad and rest of the family.

He is very proud to be living in USA and is a responsible person. I request you to grant bail to Paul and allow him to take part in legal proceedings.

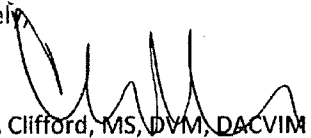

Parmod Batra May 20, 2018

May 21, 2018

Your Honor,

My wife, Rebecca Risbon, and I have known Parmjit (Paul) Parmar for 11 years. We are both veterinary oncologists and first met him as a client and have treated several of his dogs. He was very dedicated to their care and went to great lengths to help them in their battle with cancer. Since that time, we have also known him as a friend. During this time, he has always been a good and loyal friend to both of us. We stand for him as friends and can vouch for him so that he can work to clear his good name. Please feel free to contact us if we can be of further assistance.

Sincerely,



Craig A Clifford, MS, DVM, DACVIM (Oncology)



Rebecca Risbon, VMD, DACVIM (Oncology)

Contact Details:

2588 Cold Spring Road

Lansdale, PA 19446

732-233-5821 (Craig Cell)

610-348-6414 (Rebecca Cell)

Deepinder Arora
11 Embry Farm road
Marlboro NJ 07746

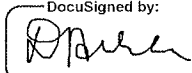
May 20,2018

Re: Paramjit Paul Parmar

Honorable Judge,

My name is Deepinder Arora and I am a practicing physician in New Jersey.I am writing in reference to Paul Parmar.I have known him for last few years as I am very good friends with his sister.I know him as a kind and genuine person.He is a man of his word and is a well respected member of our community in Marlboro and Colts neck area.He takes care of his aging father and is very reliable.I urge you to reduce his bail or eliminate it.I am sure he is eager to clear his name.

Respectfully

DocuSigned by:

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5/21/2018

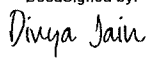
Deepinder Arora

To Whom It May Concern

My name is Divya Jain and I am a Director at Steps-2-Fit. I have known Paul Parmar for last two years. He is polite and family person who would go out of his way to help anyone in need.

Paul has all his family and friends in US. I sincerely believe that he should be granted bail and a fair chance for trial.

Sincerely,

DocuSigned by:

79BC1D81BA524F3...
Divya Jain

732-821-6765

56 Pin Oak Dr

North Brunswick – NJ - 08902

May 17, 2018.

To Whom It May Concern:

My name is Elena Sartison and I have known Paul Parmjit Parmar for over 4 years as we have been good friends ever since I came to United States. Paul has a great personality that attracts people and makes everybody like him and be friendly and nice to him. He is the person you can trust and rely on in every situation. He is a very generous man, who believed in people, inspire and put on a right path of their life.

When Paul saw how passionate I am with my business idea, he believed in me and my enthusiasm and he helped me understand various aspects of the business so I will be able to run my business effectively and make it a success. And I could see that he is very passionate about business and a very hardworking person, who always play by the rules.

Paul is the most helpful person I know. Who always ready to give a chance and opportunity.

He also loves animals very much, he always had dogs in his life and treated them as a part of the family. Once my dog Charlie got sick and even with his busy schedule Paul was there to gave me useful instructions how to treat him and make him feel better and helped him to see veterinary as soon as possible.

I am absolutely trust and respect Paul and without hesitation can say that he is very trustworthy person and a man of his word, if he promises something- he will always do.

Sincerely,

Elena Sartison.

To Whom It May Concern:

My name is Gaurav Sharma, and I am a rising sophomore at Duke University as well as Parmjit Parmar's nephew. I have been close to him for all of my 19 years of life, since we live very close together in New Jersey and he is my mom's brother. Parmjit, or Paul uncle as I call him, has filled many roles for me. He has felt like a third parent at times with his guidance and mentorship, and a friend at others, someone with whom I could share anything I wanted. Through these experiences with him, I can attest to the fact that he is a man of character and of the strongest moral fiber.

From my early school days to the present, he has pushed me to be a better student. He constantly forces me to aim higher and reach for the stars in my academics and in my career, and always with a focus on ethics. I recall a conversation we were having about me preparing for my SATs and how big of a deal the test is for high school students. Without any sort of prompt or mention of cheating, he looked at me and told me something along the lines of, "no matter how hard the pressure is or how important the consequences of this test may be, remember that you must never, ever cheat. You can recover from a bad test but you can never recover from being a bad person."

We often play board games as a family, such as Monopoly. In one game, my sister jokingly said something about swiping an extra hundred from the bank since she was in a bad position, and we laughed, knowing it was in jest. However, my uncle took even the suggestion of such a thing very seriously, looked her in the eyes, and said "cheaters never win in the end." That is a very frequent sentiment from him. He has always offered me career and life advice as well, and I can partially trace my own deep interest in business and finance to him. He offers me the utmost help and encouragement in that sense, but always with the stipulation that I remember to play by the rules, follow the law, and always put doing the right thing before doing the most profitable thing. My uncle is a god-fearing man with one of the strictest moral compasses I know, and in that way he has been a big role model for me as well.

My uncle is a very generous man to me as well. He always makes sure my sister and me have a good time and are on the right track in life. Whenever I need help with something, even when I have arguments with my parents or mess something up related to school or extracurricular activities, he is there to help. He genuinely cares about me and everyone in his family. We are very tight-knit and I can confirm he is a very loving person.

Examples of my uncle helping those around him are too numerous to fit in a book, let alone this missive, but they show the kind of person he is. When anyone we know, not just a family member or even friend, but even a distant acquaintance, has trouble or needs guidance, we do not hesitate to refer them to Paul because he has the wisdom,

patience, and kindness to help them in all circumstances. He is truly a man who embodies compassion, and many who know him have truthfully remarked that he possesses a heart of gold. He has helped people we know with marital and family issues, with career and financial problems, and some with substance abuse issues. Paul's empathy extends to animals as well, and he has supported charities dedicated to saving tigers and providing refuge to abused animals of many kinds. He is truly a gifted individual who has done a lot to help the world around him.

Paul is deeply involved in his community, and I can state unequivocally that he poses no flight risk to the court. He is well known in his town and has supported police and firefighters' causes around him, and he is well-liked by all in the area. I remember one particular instance years ago in which we were flying remote-controlled drones around his home in Colts Neck and a police officer, who had spotted them from elsewhere, came to make sure all was well. My uncle confirmed it was fine, and asked the officer if he'd like to try as well since he seemed interested. Subsequently, we flew drones again another day and he made sure to invite that Colts Neck officer to join us. He holds frequent gatherings, parties, and dinners in his home, meeting my family members and me at least once weekly, but also often inviting over many of his friends in the area as well.

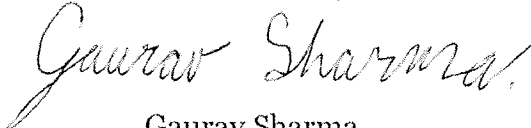
Paul is politically active and contributes to politicians with whom he shares views frequently. He often invites politicians to his home as well to discourse and share his views on how to make our county, state, and country a better place. He has always shown a deep love and appreciation for this country, and the phrase "America is the best country on Earth" is frequently heard from his lips. He flies the flag high and proud in front of his home, and he is a loyal citizen. I know Paul very well and am happy to vouch for the fact that he would under no circumstances choose to go anywhere else for the duration of this legal process. I have every bit of faith in his innocence, but beyond that he is a man who respects the law and due process. Simply put, he is heavily invested here through his family, through his friends, and through the love he has for America.

Lastly, I would just like the court to understand who my uncle is as a person. He is an intellectual and philanthropist at heart. He has a love for science, technology, history, and philosophy. He loves nothing more than learning about the world and understanding everything he can. He is perhaps the most well-read and knowledgeable person I know, and his example is one of the reasons for my own academic success and the deep love of learning I have. My uncle constantly thinks about how he can use his intelligence, knowledge, and resources to make the world a better place. Most of my conversations with Paul have had to do with issues people face, how he feels bad about it because there is so much that can be done, and how he wants things to be better. I remember a conversation we had once about success, and my uncle said something that I remember verbatim to this day: "Success comes from being a good person. In the long-

term, good people will do well in this world because they create value and God rewards them.”

There are people in this world whom we meet and whom we instantly understand are good people. Paul, for me and for all those who know him, is one of those genuinely good people. Considering my uncle's strong character, association with this country, and nonexistent flight risk, I vouch for him without hesitation with my good name, and I humbly request that you may grant him bail. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Gaurav Sharma". The ink is dark and the signature is fluid, with a long horizontal stroke at the end.

Gaurav Sharma

5 Muncee Court
Holmdel, NJ 07733

(732) 856-4647


Honorable Judge:

My name is Harmohan Parmar, and I am a Technology Architect working with Springer Nature in New York City as well as a part time student pursuing a Masters in Information Management Systems at Harvard Extension School. I am the younger brother of Parmjit (Paul) Parmar. I have known him throughout my life, and the privilege of knowing him has fostered in me a deep respect and love for him. He has helped me throughout my life, whether it was mentoring me with my studies or advice in many situations; whenever I need anything, I can count on him. I understand from news articles the recent trouble he is in and clearly, I have hard time imagining that he committed such crime.

Throughout my life, I have seen my brother excel at everything, be it sports or studies. He has always been a Grade A student and I have seen him change careers and be successful in whatever he set his mind to. I have seen him go out of his way and help people, one example being when his friend Lou Rathburn from TX was undergoing personal problems and he opened the doors of his home to her and gave her place to stay. When I moved from upstate NY to NJ with a job change, he let me stay at his home indefinitely until I was ready to find my own place. He is also a big animal lover, and in one instance one of his friends reached out to him because they had found a lost Siberian Husky in NY and Parmjit (Paul) immediately took the dog in his care and posted several ads on Craigslist to find the owner. The dog was with him for few days and there was a happy reunion with the owner, whom Parmjit (Paul) was able to find eventually. In another instance, my friend Joe Whitty from work needed help with personal problem he was having, and requested to talk to my brother and get advice. Again, my brother went out his way, to help him. He always makes an effort to help people around him and his family and friends will stand by him despite the charges.

Parmjit (Paul) Parmar is very thoughtful and kind person. I can assure you that Mr. Parmjit Parmar will comply with judicial process and appear for all the appearances as directed by the court. He is neither a flight risk and nor a danger to the community. I have known him to be a helpful, caring, and considerate individual and the charges against him are not a reflection of the person I have known my whole life. I would be happy to provide to any further additional details or even testify in person.

Sincerely,


Harmohan Parmar
05/18/2018

Home Address
40 Broad St
Apt 20FG
New York, New York 10004
Ph 7326878924

Work Address
233 Spring St
New York, New York 10013
Ph 6465916632

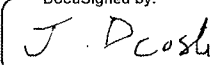
To Whom It May Concern

May 18, 2018

To Whom It May Concern,

My name is Jenny Dcosta and I currently work in New 3B'S Furniture as sales manager. I have known Paul Parmar, his family and friends very well for the past 14 years. I can assure you that Paul's character is one of the most caring, reliable, generous and helpful people in this world. He supports families and his friends so strongly. I would be happy to further provide you with any additional details regarding Paul.

Sincerely,

DocuSigned by:

B62EBD10A75B47C...
5/18/2018

Jenny Dcosta
84-30 264 street
Floral Park
New York 11001
646-3594585

To whom it may concern

Dear Sir,

My name is Nerupama Batra. I am a citizen of USA and have been in the USA since 1995. My family and I live at 114 Manchester Drive, Barrington, IL, 60010.

My husband, Parmod Batra is Paul's friend since 1990. Through my husband, I have met Paul's family (brother, sister, brother-in-law, dad and late mother) a few times.

All of Paul's immediate family (Father, sister and her family, brother and his family) lives in NJ area. He has a strong bond with his family. His dad lives with him and he takes care of him.

I request you to grant bail to Paul and allow him to take part in legal proceedings.

Batra
May 20, 2018

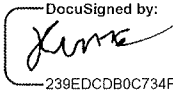
Nerupama Batra

To whom so ever it may concern

I am Joy Kumar. I live in 434 Indigo Ct Morganville. I am a Software Professional. I know Paul Parmar for the last 8 years. To my knowledge, he is a nice person and a great entrepreneur. He has his immediate family and close friends and property here. I sincerely feel that he should be granted bail and a fair chance for a trial.

If you have any questions, please feel free to reach out to me at the time of your choosing and convenience.

Thanks,

DocuSigned by:

239EDCDB0C734F4...

5/20/2018

Joy kumar

732-284-6594

434 Indigo Court

Morganville, NJ- 07751

Dear Judge,

I am Kiran sharma, Parmjit (Paul) Parmar's older sister. I am a citizen and have been in USA for about 22 years. I am Married with 2 kids. Our entire immediate family lives in USA. Which include my 2 brothers and our Father. My Mother passed away in 2005 in NJ itself. My Dad has been staying here with Paul since. Paul has been an ideal son and takes care of dad in every aspect of his life. Since we have no immediate family or support system in India, my dad has not even visited India in last 13 years.

My younger brother just got married last year and lives with his wife in New York. Paul has mentored, supported and helped my younger brother achieve a good life. Paul is very attached and deeply connected with his family. Paul always goes out of the way to help and support family, friends and people in need.

Over the last 26 years in USA, Paul has earned a very special position in our hearts and in society. He is well respected and honored member of many communities. He is so deep rooted and strongly bonded with people in the neighborhood that he is always considered part of almost every social event. His moral character is strong, and he upholds a sincere respect for the law. He has been a great example for everyone, and I am sure he would never jeopardize his family, friends and community in any way for his own benefit. In fact, he is always there for everyone.

Paul only visits India for occasional vacation and stays in Hotels. He has no property or vested interest there. He always mentions that we are so lucky to be living in greatest country on earth. He recognizes opportunities he got because of living in USA. He is a respected person, who deserve a chance to clear his name and participate in legal proceedings.

I sincerely request you to grant bail to Paul.

A handwritten signature in black ink, appearing to read 'Kiran Sharma', with a stylized flourish at the end.

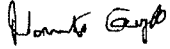
Kiran Sharma
5 Muncee Ct, Holmdel, NJ 07733

Dear Judge,

I have known Parmjit (Paul) Parmar for approximately 4 years now. I am a close personal friend of his sister and know his entire immediate family. Every interaction with Paul I have ever had has reaffirmed to me that he is a kind and considerate person. His entire family's way of life is based upon strong values and traditions. He values his loved ones above all else and would never do anything to hurt them intentionally. He is not a flight risk and will have his day in court to face whatever charges are brought against him.

I request the court to allow him to post bail, return to his family, and prepare for his official court date. I am ready to testify to these facts if necessary in a court of law.

Thank you,

DocuSigned by:

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5/21/2018

Mamta Bansal Gupta, MD

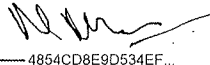
To Whom It May Concern

Dear Sir,

I Mehboob Haider residing at 336 Cayuga Avenue East Meadow New York 11554.
And am a lawful abiding US citizen have known the Parmar family since 7 years.
Please do take into consideration that Mr. Parmar is a family man and is well
known in the Asian community. I hereby stand guarantee for Mr. Paul Parmar.

Thanking you

Yours sincerely

DocuSigned by:

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5/18/2018

Mehboob Haider

5164688536

To Whom It May Concern

My name is Namrata Kumar and I work at NYC DOHMH. I have known Paul Parmar for last 8 to 10 years. As far as I have known Paul, he is a person of great strength of character and compassion for others. I have seen him as a person who would go out of his way to help anyone in need. He is a great entrepreneur and visionary and I respect him for that.

Paul has all his family and friends in US and he owns property in US. For this reason, I strongly believe he is heavily invested in this place. I sincerely believe that he should be granted bail and a fair chance for trial.

If you have any questions, please feel free to reach out to me.

Sincerely,

DocuSigned by:
Namrata Kumar
251D08FC9EC34AC...
5/20/2018

Namrata Kumar,
732-788-9941
434 Indigo Court,
Morganville, NJ 07751

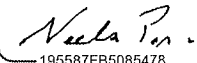
Honorable Judge
United States District Judge

RE: Parmjit Paul Parmar

My name is Neelu Parmar, D.D.S., a practicing dentist with offices in New Jersey. I live in Holmdel, New Jersey with my three daughters, husband and my father in law. I am writing on behalf of Paul Parmar. I have known Paul for the last 8 years. His sister and I are very close friends. Our families are close also. As far as I am concerned, Paul is a kind, reliable and sensible person. He goes out of his way to help people and he is very well known in the Colts neck and Holmdel communities. He is a genuine person and man of his word.

Judge I urge you to please reduce or eliminate his bail. All his family and friends are located in this area, therefore I know he is not a flight risk. Also, I know this man does not run away from problems will want to clear his name.

Respectfully Yours

DocuSigned by:

195587FB5085478...
5/21/2018

Neelu Parmar DDS

To Whom It May Concern

My name is Piyush Bhatnagar and I am the founder and Chief Visionary Officer of Authomate Inc., a small technology startup.


I have known Paul Parmar for just over seven years. We met through common friends and I found him a man of few words. Over the years I have come to know him as a humble and caring person. He is always there for his friends and goes out of the way to lend a helping hand to anyone, whenever needed.

His extended family, (sister and family, brother and family, and his father) all live in USA. Ever since I have known him, I have seen him take good care of the extended family. The way he takes care of his old father is exemplary and I have immense respect for him just for that.

Having seen how he treats his extended family as well as his friends, I firmly believe Paul is a caring and dedicated man with good morals and ethics and will always do the right thing.

I sincerely believe Paul can be trusted to meet any conditions put forth for his bail and thus I request you that he be granted a bail and a fair chance for trial. If you have any questions, please feel free to reach out to me.

Sincerely,

DocuSigned by:

715D347E7E334FB...
5/21/2018

Piyush Bhatnagar
732-763-6690
61 Brown Road
Morganville, NJ 07751

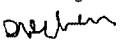
To Whom It May Concern

Dear Sir,

I Priya Rehan residing at 44 33 65 street Woodside queens New York 11377. And am a lawful abiding US citizen have known the Parmar family since 10 years. Please do take into consideration that Mr. Parmar is a family man and has to take care of his aging dad. I hereby stand guarantee for Mr. Paul Parmar.

Thanking you,

Yours sincerely

DocuSigned by:

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5/18/2018

Priya rehan

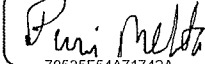
5163036597

To whomsoever it may concern

This is to verify that I have known Paul Parmar at a social capacity and as the younger brother of my friend Mrs. Kiran Sharma. He seems to be a very social person and is a family oriented individual. Over the past few years I have seen him at family events and my interaction with him was very pleasant.

I am employed at Amboy Bank as personal Banker and I reside at the above-mentioned address. Paul is very well vested in US with his family & friends here. I feel he should be granted a bail and a fair chance.

Regards

DocuSigned by:

70535F54A71742A...
5/20/2018

Purvi Mehta
73 Gate Lane
Old Bridge, NJ 08857

Dear Judge,

I am Salil sharma, Parmjit (Paul) Parmar's Brother-in-law. I am a citizen and have been in USA for about 24 years. I am Married with 2 kids. I run a NJ based software consulting firm Sage Group Consulting, Inc. Our office is located at 3400 Highway 35, Suite 9, Hazlet, NJ 07730.

I have known Paul for last 28 Years from my college days. He is a very trusted friend for life. He became my brother in law 21 years ago. I have known him as a very bright, knowledgeable, loving, caring, family-oriented person. We meet every week and spend time together as a family for over 20 years. I have seen him always putting the friends and family interest first. For past 26 years he has been working in USA and living in NJ. All his immediate family is in NJ and most of maternal relatives are in USA. He has built strong relationships with friends, families and community in USA. He is well known and respected in USA Indian community. He travels for business reason to overseas.

Over the last 26 years in USA, Paul has earned a very special position in our hearts and in society. He is well respected and honored member of many communities. He is so deep rooted and strongly bonded with people in the neighborhood that he is always considered part of almost every social event. His moral character is strong, and he upholds a sincere respect for the law. He has been a great example for everyone, and I am sure he would never jeopardize his family, friends and community in any way for his own benefit. In fact, he is always there for everyone.

Paul is not a flight risk as he is totally vested in USA. He feels proud to be living in greatest country on earth. He recognizes opportunities he got because of living in USA. He is a respected person, who deserve a chance to clear his name and participate in legal proceedings.

Paul has a strong sense of his responsibilities. His dad (a retired Indian Navy officer) lives with him and he takes care of dad in all aspects. I have witnesses hundreds of incidents where Paul has sacrificed personally to support friends and families. He is the person who has always stood with people in need of support. I have known Paul to be a very responsible and sincere person who never shies away from his duties. I sincerely request you to grant bail to Paul.

Salil Sharma
5 Muncee Ct, Holmdel, NJ 07733
732-491-7315

To Whom It May Concern

Sarah Reinsch

26 Grand St Apt 12

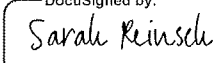
New York, NY 10013

May 18, 2018

To Whom It May Concern,

My name is Sarah Reinsch and I currently work in product development Freelance for Solomon Page. I am writing on behalf of Paul Parmjit Parmar today, I have known Paul Parmjit Parmar, his family and friends very well for the past 8 years. I can assure you that Paul's character is one of the most caring, reliable, generous and helpful people in this world. He supports families and his friends so strongly, I have multiple examples of witnessing him immediately helping others when they reached out constantly. He brings families together and promotes the well being of others. Paul is extremely influential to others in positively helping the well being of his community, family and friends. Paul immediately and constantly supported, cared and has really been influential in helping families through difficult situations. He is one of the best men I have ever known, I would be happy to further provide you with any additional documentation or details regarding you may need to I hold Paul Parmjit in the highest regard and urge you to reduce or eliminate his bail.

Sincerely,

DocuSigned by:

8096415C5313C4BD
Sarah Reinsch

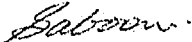
Dear Sir

I Abdul Saeed Sabooni residing at 9 Cedar Lane North Glen Head NY 11545 and I am a lawful abiding US citizen have known Mr. Paul Parmar for last 12 years as a family man and is well known in the Asian community. He is always being kind and very helpful to people around him.

I hereby stand guarantee for Mr. Paul Parmar.

Thanking you

Yours Sincerely



Abdul Saeed Sabooni
917-662-14102

To Whom It May Concern

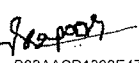
My name is Simi Kapoor and am self-employed and President of Knoxx Hardware. Knoxx Hardware sells door and cabinet hardware through e-commerce websites. I have known Paul Parmar for about seven years. He is a good friend, cordial and a good person who is always there for his friends and family and goes out of his way to help his friends and family in need.

In my opinion, Paul Parmar is not a flight risk since he is totally vested in U.S. He has his loving sister and family, brother and family, and father here in U.S.A. He truly values his extended family and friends and would never risk going out of U.S, unless permitted.

I truly believe that Paul Parmar should be granted a bail and given a chance for a fair trial.

Please feel to contact me If you have any questions regarding this.

Yours Sincerely,

DocuSigned by:

B03AACD1393E472...
5/21/2018

Simi Kapoor
732-763-6689
61 Brown Road
Morganville, NJ 07751

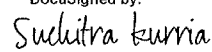
To Whom It May Concern

My name is Suchitra Kurria and I have known Paul Parmar since my College years in 1991 and have stayed in touch since then. We studied in the same college and I can attest to his strength of character and compassion for others. He is a great friend and even better person who would go out of his way to help anyone in need.

I also had the pleasure of working in his company from 2003-2009. He is a great entrepreneur and visionary and I respect him for that. Having worked with him, I can vouch for his work ethics, dedication and trustworthiness.

If you have any questions, please feel free to reach out to me.

Sincerely,

DocuSigned by:

BAA3577F933F447...

5/17/2018

Suchitra Kurria
732-429-3192
1 Appaloosa Drive
Manalapan, NJ 07726

May 17, 2018

Honorable Judge,

My name is Sumit Manhas and I live at 384 Walnut Tree Hill Road, CT. This letter is on behalf of Paul Parmar. He is my cousin and I have known him for more than 30 years throughout my entire life so far. He has always treated me with love and cared about me like his real sister.

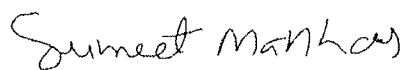
I have known him as a kind-hearted person who has always helped anyone in need. These values have earned his tremendous respect and regard within the community.

Paul is an outstanding person and loves all his family members and friends. He is most happy to be around his loved ones and never misses a chance to be close to his family here in US.

Paul has a large group of family, friends and well-wishers here, looking forward for his well-being and wishing him the best.

Please do not hesitate to contact me if you need more information.

Thanks

A handwritten signature in black ink that reads "Sumit Manhas". The script is cursive and fluid, with the first name "Sumit" and last name "Manhas" clearly distinguishable.

Sumit Manhas
Cell: 419 283 3317

Honorable Judge:

I am writing for Mr. Paul Parmar who is currently in custody. I have known Paul from 2016 and I got married to his brother Harmohan Parmar last year. I am law school graduate, currently working as chief paralegal at a lawfirm and preparing for the New York State Bar exam. Paul has been most comforting and welcoming person to me during my courtship period with my husband and after the wedding. I found him to be extremely supportive of my husband, caring to his niece and nephew, he takes care off his father, and is always there when his family and friends need him.

I find him to be an educated matured person who understands the nature of his actions and consequences. It is hard for me to even imagine some of his conduct that is mentioned in articles. I stand by him despite the charges and would like this court to consider the collateral I am putting down towards his bail and my assurance that he is not a flight risk and danger to the community. In my last few years of interactions and meetings with him I have always looked up to him. As I mentioned earlier, once he is released he will not be a danger or threat to community and is not a flight risk.

I sincerely request you to accept my letter and release him on bail.

Thank You,
Supreet Parmar

Home Address:
40 Broad Street
Apt 20FG
New York, New York 10004
Tel: 347-435-8217

Work Address:
Law Offices of Gus Michael Farinella, PC
130 West 15th Street
Suite 07M
New York, New York 10011
Tel: 212-675-6161

May 17, 2018

Dear Judge,

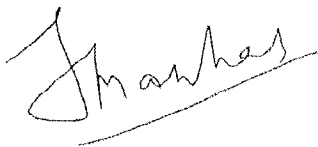
I, the undersigned am writing this to letter to state that I have known Parmjit (Paul) Parmar for more than 13 years now. He is a person of good character with deep rooted family values. He has a wide circle of friends and family and is highly respected and loved by all. He is well known for his involvement within his community and has always exhibited extensive ties and attachment with people around him.

As a part of Paul's family, I have always witnessed him supporting and volunteering help for anyone in need. He has built enormous goodwill amongst the people he is in contact with in everyday life.

I have complete confidence in stating that Paul places a very high value in his relationships with his loved ones including family and friends. He is a compassionate son, brother and above all a cherished friend to all. His dedication as a family man and strong sense of community would show that he is not a flight risk. I can assure you that he would work diligently to exonerate himself and clear his good name.

I hold Paul in the highest regard and urge you to reduce or even eliminate his bail. I would be happy to provide additional information and even testify in person if needed.

Sincerely.

A handwritten signature in black ink, appearing to read 'Surjeet Singh Manhas', with a horizontal line underneath.

Surjeet Singh Manhas

Contact Details.

Home:
384 Walnut Tree Hill Road,
Shelton CT
203 7127676

Work:
Senior Software Engineer
50 Danbury Road, Wilton CT
203 2783123

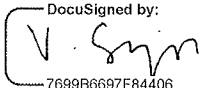
Varinder Singh
11 Embury Farm Road
Marlboro NJ 07746

Honorable judge

I am writing this letter in support of Paul Paramjit Parmar. I have known Paul for last two years. My name is Varinder Singh, I am a practicing physician in state of New Jersey. My daughter and Paul's niece have been good friends for the last 3 years.

Paul is a respected member of community in Monmouth County and is honest hard working man. He has close ties with family. I urge you to please consider reducing his bail

Sincerely

DocuSigned by:

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5/21/2018

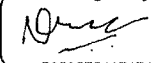
Varinder M Singh

To whom it may concern

I work at Arch Insurance as a Sr. Database Analyst and I have a general acquaintance of Mr. Paul Parmar. My overall impression of him is that he is a very friendly and caring individual, who is willing to help and support people to best of his abilities. I have seen him at few gatherings and events where I was able to exchange pleasantries with him and at that I found him to be a personable individual.

Paul has many relatives and family members here in US and he is deeply invested in this place, hence I feel that he should be granted bail and fair chance for a trial.

Regards

DocuSigned by:

70536F54A71742A...

5/20/2018

Vishal Mehta
73 Gate Lane
Old Bridge, NJ

May 20, 2018

Dear Honorable Members of the Court,

I, Vishal Gupta, would like to attest and affirm that I have known Parmjit (Paul) Parmar for more than 4 years now as a friend and have known his sister and brother-in-law for slightly longer. The family is deeply rooted in New Jersey with Mr. Parmar's father, sister, brother-in-law, younger brother and sister-in-law, and niece and nephew all residing in New Jersey for multiple years.

Mr. Paul Parmar is a stable person who cares deeply for his family, employees, associates, and friends. He is well known in the central New Jersey community for his generosity and philanthropy. Above all, Paul Parmar stands behind his actions and decisions. He is a man of courage and personal integrity. He will face any challenges and honor his responsibilities without any thought of denying the facts.

Finally, Paul is a very religious person and a firm believer in God and doing the right things in life. I whole-heartedly would vouch for Paul Parmar and give you my word that he will face the court and accept your ultimate decisions. I would gladly testify to his character and personal accountability.

Like Paul Parmar, I have a family who cares for me and a career that I am proud of. Difficulties and mistakes are a part of life, but people with integrity and character always face those realities head on. Please allow him to return home and prepare the best defense that he can. I am confident that justice will ultimately prevail for all parties involved.

Sincerely and Best Regards,



Vishal Gupta

54 Harbor Road

Morganville, NJ 07751

(732) 430-9631

To Whom It May Concern

My name is Vivek Jain and I work at Guardian Life insurance Company of America . I have known Paul Parmar for many years. We studied in the same college and I can attest to his strength of character and compassion for others. He is a great friend and even better person who would go out of his way to help anyone in need.

Paul has all his family and friends in US and he owns properties in US. For this reason, I believe that he is deeply invested in this place. I sincerely believe that he should be granted bail and a fair chance for trial. If you have any questions, please feel free to reach out to me.

Sincerely,

DocuSigned by:

798C1D518A524F3...
Vivek Jain

848-391-8088

56 Pin Oak Dr

North Brunswick – NJ - 08902